

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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**IN RE: BPS DIRECT, LLC and  
CABELA’S, LLC, WIRETAPPING**

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**MDL NO. 3074  
2:23-md-03074-MAK**

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**AFFIDAVIT OF JASON K. WARD IN SUPPORT OF HIS  
UNOPPOSED MOTION FOR ADMISSION *PRO HAC VICE***

The undersigned, being duly sworn, deposes and states the following:

1. I, Jason K. Ward, am an attorney with the law firm of Shook, Hardy & Bacon L.L.P. in Kansas City, Missouri. By this Affidavit and the Motion to which it is attached, I seek admission *pro hac vice* to represent Defendants BPS Direct, LLC and Cabela’s LLC in this consolidated action.

2. I reside in the state of Kansas, and my principal office is located at 2555 Grand Boulevard, Kansas City, Missouri; telephone number (816) 474-6550; email [jward@shb.com](mailto:jward@shb.com).

3. I agree to pay the necessary filing fee in conjunction with the filing of the motion to appear Pro Hac Vice.

4. I am admitted and licensed to practice and in good standing in the following courts:

- a) State of Kansas (Admitted 1999 – Bar No. 19293)
- b) State of Missouri (Admitted 2000 – Bar No. 51735)
- c) USDC Western District of Missouri (Admitted 2000)

5. I have never been suspended from the practice of law in any jurisdiction or received any public reprimand by the highest disciplinary authority of any bar in which I have been a member.

6. I (i) have read the most recent edition of the Pennsylvania Rules of Professional Conduct and the Local Rules of this Court and (ii) agree to be bound by both sets of Rules for the duration of the case for which pro hac vice admission is sought.

7. If granted pro hac vice status, I will in good faith continue to advise Erin Leffler, counsel who has moved for the *pro hac vice* admission of the current status of the case for which pro hac vice status has been granted and of all material developments therein.

8. I have confirmed with Erin Leffler, counsel who has moved for the *pro hac vice* admission, that she will continue to honor her obligations and responsibilities in this Action, including to be present in all instances listed in this Court's Policies and Procedures.

9. I have been involved with the development to-date of Defendants' defense in this matter, including Defendants' Opposition to Plaintiffs' Motion to Compel Production of Session Data. (ECF No. 76).

10. I declare under penalty of perjury, under the laws of the United States of America, that the foregoing is true and correct.

November 13, 2023

By:   
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